

In accordance with the Federal Rules of Civil Procedure 6(b)(1), Defendant, by and through undersigned counsel, respectfully requests this Court to further extend the time to oppose Plaintiff's Motion for Spoliation Sanctions for four (4) days until Friday, September 12, 2014. The opposition is otherwise due on Monday, September 8, 2014. Pursuant to Local Civil Rule 7(m), Plaintiff's counsel has been contacted and does not consent to the four (4) additional days requested.

Defendant is requesting the additional time for a number of reasons. First, one agency declarant is not be available until Monday, September 8, 2014 and, in an abundance of caution, the extra time is needed to finalize her declaration; second, additional time is necessary for the U.S. Attorney's Office and the Department of Justice to review the brief; and third, the time is being requested because of defense counsel's current litigation schedule. Undersigned counsel has been otherwise occupied with a number of litigation matters including: multiple meetings to discuss settlement in *Anderson v. Duncan*, Civ. Act. No. 06-1565 (RMC); answering the third set

of interrogatories and requests for the production of documents in *Bowe-Connor v. Eric Holder*, Civ. Act. No. 13-1993 (KJB); multiple conference calls and meetings regarding release of documents in *Washington Newspaper Pub. Co., LLC v. CFPB*, Civ. Act. No. 14-0444 (BAH); site visit to location of tort and conferences with expert in *Wise v. Federal Reserve Bank*, Civ. Act. No. 12-1636 (RC) in preparation for his report; preparation for deposition of plaintiff in *Wise*; researching issues for Reply in *Hinton v. Combined Systems, Inc. et al.*, Civ. Act. No. 13-0834 (CKK) to be filed during the second week of September.

For the foregoing reasons, Defendant respectfully requests a four (4) day extension of time to file its opposition on Friday, September 12, 2014. No Further extensions are expected.

Respectfully submitted,

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For the District of Columbia

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/s/

By:

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**UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA**

**LANDMARK LEGAL FOUNDATION**

**Plaintiff,**

**vs.**

**U.S. ENVIRONMENTAL PROTECTION  
AGENCY**

**Defendant.**

**Civ. Act. No. 12-1276 (RCL)**

**ORDER**

Upon full consideration of the Motion, it is ORDERED that:

The Defendant's Motion for a four (4) day Extension of time to file its Opposition is hereby GRANTED. The Defendant shall file its Opposition by September 12, 2014.

SO ORDERED.

Date: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge